

COMPANY: Pacific Bell  
STUDY AREA: California  
PERIOD: From Oct 1995 To Dec 1995  
COSA: PTCA

APPROVED BY UNO  
3060-0395  
Expires 05/31/96  
UNRESTRICTED VERSION  
SUBMISSION 1  
TABLE V

TABLE V - SERVICE QUALITY COMPLAINTS

Row	Classification	Column		
		Total (aa)	MSA (bb)	Non-MSA (cc)
0320	No Business Access Lines	6,408	6,197	211
0321	Fed Complaints Bus Users	0	0	0
0322	State Complaints Bus Users	6	6	0
0330	No Residential Access Lines	11,004	10,450	554
0331	Fed Complaints Res Users	0	0	0
0332	State Complaints Res Users	31	27	4

## ARNIS QUARTERLY SERVICE QUALITY REPORT

COMPANY: Pacific Bell  
STUDY AREA: California  
PERIOD: From Oct 1995 To Dec 1995  
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3060-0395  
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FOOTNOTE TABLE  
PAGE 1 OF 1

## FOOTNOTE TABLE

Table	Rev	Col	FNB Footnote	
(a)	(b)	(c)	(d)	(e)
I	0110	A	1	Date provided at circuit level.
I	0110	C	2	Date provided at circuit level.
IV	0200	R	3	Less than 2 minutes.
IV	0201	R	4	Less than 2 minutes.
IV	0210	R	5	Less than 2 minutes.
IV	0211	R	6	Less than 2 minutes.
IV	0212	R	7	Less than 2 minutes.
IV	0213	R	8	Less than 2 minutes.
IV	0214	R	9	Less than 2 minutes.
IV	0200	S	10	Ratio: column R to column Q.
IV	0201	S	11	Ratio: column R to column Q.
IV	0210	S	12	Ratio: column R to column Q.
IV	0211	S	13	Ratio: column R to column Q.
IV	0212	S	14	Ratio: column R to column Q.
IV	0213	S	15	Ratio: column R to column Q.
IV	0214	S	16	Ratio: column R to column Q.
IV.A	0220	ALL	17	Translation work error caused automatic system initialization.

OCT-08-1996 09:02

PAC BELL FED REG

415 495 0741 P.24/49

ARMIS QUARTERLY SERVICE QUALITY REPORT

ARMIS 0741 07 090

3060-0395

Expires 05/31/96

UNRESTRICTED VERSION

SUBMISSION 1

CONF. TREATMENT TABLE

PAGE 1 OF 1

COMPANY: Pacific Bell

STUDY AREA: California

PERIOD: From Oct 1995 To Dec 1995

COSA: PTCA

### CONFIDENTIAL TREATMENT TABLE

Table Row Column(s)

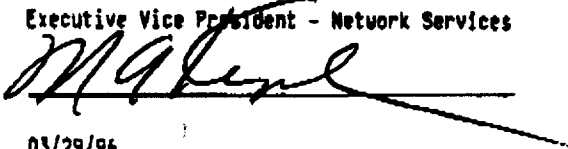
(a) (b) (c)

THE COMPANY HAS NOT REQUESTED CONFIDENTIAL TREATMENT FOR ANY DATA  
IN THIS REPORT.

PTCA 0010769

## CERTIFICATION

I certify that I am an officer of Pacific Bell;  
that I have examined the foregoing report and that to the best of my  
knowledge, information, and belief, all statements of fact contained in this  
report are true and that said report is an accurate statement of the affairs  
of the above named respondent in respect to the data set forth herein for  
the period from 10/01/95 to 12/31/95.

PRINTED NAME Martin A. Kaplan  
POSITION Executive Vice President - Network Services  
SIGNATURE   
DATE 03/29/96

(Persons making willful false statements in this report form can be punished  
by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).)

CONTACT PERSON Irene Lynch  
TELEPHONE NUMBER (615) 562-6061

**ATTACHMENT 6**  
**POSSIBLE FEDERAL INTERLATA PROVISIONING AND**  
**MAINTENANCE REPORTS**

**PACIFIC BELL ALL CUSTOMER (Less INTERLATA SEPARATE AFFILIATE)**  
**FCC INTERLATA QUARTERLY REPORT Provisioning/Installation Activity**  
**Report Period: XXX-XXX 199X**

Service	%MA	Average Interval
Feature Group A		
Feature Group B		
Feature Group D		
Basic Data and Voice (Analog Dedicated Access)		
Digital Dedicated Access		
1.544 MBPS BSA (DS-1 High Capacity Access)		
DS-3 And Above Access		

Notes: MA: Missed appointments due to Company reasons

Average Interval: Taken Date to Due Date Interval in business days

\* Indicates number of orders was too low for reported data to be statistically significant

**INTERLATA SEPARATE AFFILIATE**  
**FCC INTERLATA QUARTERLY REPORT Provisioning/Installation Activity**  
**Report Period: XXX-XXX 199X**

Service	%MA	Average Interval
Feature Group A		
Feature Group B		
Feature Group D		
Basic Data and Voice (Analog Dedicated Access)		
Digital Dedicated Access		
1.544 MBPS BSA (DS-1 High Capacity Access)		
DS-3 And Above Access		

Notes: MA: Missed appointments due to Company reasons  
Average Interval: Taken Date to Due Date Interval in business days  
\* Indicates number of orders was too low for reported data to be statistically significant

**PACIFIC BELL ALL CUSTOMER (Less INTERLATA SEPARATE AFFILIATE)**  
**FCC INTERLATA QUARTERLY REPORT Maintenance/Repair**  
**Report Period: XXX-XXX 199X**

<b>Service</b>	<b>%MA</b>	<b>Avg-RC</b>
Feature Group A		
Feature Group B		
Feature Group D		
Basic Data and Voice (Analog Dedicated Access)		
Digital Dedicated Access		
1.544 MBPS BSA (DS-1 High Capacity Access)		
DS-3 And Above Access		

Notes: MA: Missed appointments due to Company reasons  
 Avg-RC: Average receipt to clear in hours and minutes  
 \* Indicates number of orders was too low for reported data to be statistically significant



**INTERLATA SEPARATE AFFILIATE**  
**FCC INTERLATA QUARTERLY REPORT Maintenance/Repair**  
**Report Period: XXX-XXX 199X**

<b>Service</b>	<b>%MA</b>	<b>Avg-RC</b>
Feature Group A		
Feature Group B		
Feature Group D		
Basic Data and Voice (Analog Dedicated Access)		
Digital Dedicated Access		
1.544 MBPS BSA (DS-1 High Capacity Access)		
DS-3 And Above Access		

Notes: MA: Missed appointments due to Company reasons  
Avg-RC: Average receipt to clear in hours and minute s  
\* Indicates number of orders was too low for reported data to be statistically significant

***ATTACHMENT 7***  
**Testimony of Jerald R. Sinn before the CPUC**  
**September 16 & 24, 1996**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**In the Matter of the Application of  
AT&T Communications of California, Inc.  
for Arbitration Pursuant to Section 252 of  
the Federal Telecommunications Act of  
1996 to Establish an Interconnection  
Agreement with Pacific Bell**

**Application No. 96-08-040**

**Errata Regarding Testimony of JERALD R. SINN  
On Behalf of  
Pacific Bell (U-1001-C)**

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Telephone: (202) 429-7000  
Facsimile: (202) 429-7049**

**Attorneys for Pacific Bell**

**Dated: September 20, 1996**

**Before the Public Utilities Commission  
of the State of California**

In the Matter of the Petition of )  
AT&T Communications of California, Inc. )  
For Arbitration Pursuant to Section 252 of the )  
Federal Telecommunications Act of 1996 )  
to Establish an Interconnection )  
Agreement with Pacific Bell )  
\_\_\_\_\_ )

**Application No. 96-08-040**

**Testimony of JERALD R. SINN  
On Behalf Of  
Pacific Bell (U-1001-C)**

**Dated: September 16, 1996**

**Steven D. Rathfon  
Margaret E. Garber  
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140 New Montgomery Street  
Suite 1025  
San Francisco, California 94105  
(415) 542-2220**

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**INTRODUCTION**

1

2

3 **Q.1. Please state your name and business address.**

4 A. My name is Jerald R. Sinn. My business address is 370 Third Street,  
5 Room 714 E, San Francisco, California 94107.

6

7 **Q.2. By whom are you employed and what are your responsibilities?**

8 A. I am employed by Pacific Bell Industry Markets Group as  
9 Communication Management Services Vice President. I am responsible for  
10 customer service functions to all Industry Market Group customers. I have held  
11 this position since January, 1994.

12

13 **Q.3 Please briefly describe your educational and business background.**

14 A. I attended California State University, Long Beach, and, received a  
15 Bachelor of Science Degree in Investment Finance. I have thirty-five years of  
16 experience in telecommunications management with Pacific Bell. I have held  
17 positions in Operations, Engineering, Financial Management, Planning and  
18 Customer Service. I have formal training and/or working experience in  
19 operations statistics, Total Quality Management and process management.

20

21 **Q.4. Have you previously appeared before this or other state regulatory**  
22 **commissions?**

23 A. No.

24

25 **Q.5. What is the purpose of your testimony?**

26 A. The purpose of my testimony is to explain the process of measuring  
27 service parity between what Pacific Bell provides to AT&T and what we provide

1 to ourselves, our affiliates, and other parties. I will demonstrate why AT&T's  
2 proposed "Total Services Resale" ("TSR") request (Richards page 2) is a  
3 marketing strategy of service differentiation and goes beyond what is needed to  
4 meet the requirements of The Federal Telecommunications Act of 1996 and  
5 the First Interconnection Order.<sup>1</sup> Finally I will discuss when remedies for non-  
6 performance are appropriate and how they may be applied.

7 Section I of my testimony addresses the definition of comparative  
8 measures and performance standards which demonstrate that we are providing  
9 "non-discriminatory access " to unbundled network elements, resale services  
10 and interconnection that is "at least equal in quality" to that provided ourselves  
11 and our affiliates as required by Section 251(c)(2)(C) of the Act and Paragraph  
12 254224 of the First Interconnection Order. I will further demonstrate why the  
13 prescriptive measures of performance recommended by AT&T, referred to as  
14 "Direct Measures Of Quality" ("DMOQ's") (AT&T Br. at pages 23-25), are not  
15 appropriate to use for ensuring parity of service for interconnection, resale and  
16 unbundled network elements.

17 Section II of my testimony and associated appendices describes the  
18 necessary comparative measures and performance standards that are included  
19 in Pacific Bell's proposed contract. I will explain why our proposed comparative  
20 measures and performance standards are appropriate to demonstrate "non-  
21 discriminatory" access to unbundled network elements and resale services and  
22 to provide interconnection "at least equal in quality" to that provided to  
23 ourselves, our affiliates, and other parties.

24 Section III of my testimony details our proposal for remedies in the form  
25 of liquidated damages. The Act authorizes arbitrators to prescribe only those  
26

27 <sup>1</sup> Implementation of The Local Competition Provisions in The Telecommunications Act of 1996, CC  
Docket no. 96-98, FCC 96-325 (released Aug. 8, 1996) (First Interconnection Order)

1 conditions needed to "meet the requirements of section 251." Nothing in the  
2 Act, explicitly or implicitly, mandates that interconnection agreements include  
3 measures of performance or penalties. Nevertheless, we are willing to  
4 voluntarily negotiate reasonable liquidated damages for non-performance that  
5 are tied directly to the statutory non-discrimination obligation in the Act, rather  
6 than to arbitrary, prescribed levels of quality desired by AT&T. My testimony  
7 describes a specific proposal for these remedies.

8  
9 **SECTION I. PERFORMANCE MEASURES AND DEFINITIONS**

10  
11 **Q.5. How does Pacific Bell determine "service equal in quality"?**

12 **A.** The measure of "equal" is comparative, not prescriptive. The Act  
13 requires Pacific Bell to provide service to AT&T at levels at least equal in quality  
14 to that which we provide to ourselves, our affiliates, and other parties. Service  
15 parity will be measured (1) by class of service (e.g., residence, business); (2)  
16 geography; and (3) over a comparable time period. As long as all end users  
17 experience a comparable service level for the same class, geography and time,  
18 the requirements of the First Interconnection Order will be met.

19 Arbitrary, prescribed service levels, as suggested by AT&T, will not  
20 facilitate the measure of service as equal in quality. A prescribed service level  
21 only defines a specific level of service, but provides no information about the  
22 equality of service levels actually delivered. For example, our current service  
23 level for trouble reports on business installations is 3.7 reports per 100 lines in  
24 service. AT&T has requested a service level of 0 for Business, or 100%  
25 accuracy. Clearly, providing service at AT&T's prescribed level will not be at  
26 parity with service provided to our retail customers, and is not necessary to  
27 ensure nondiscriminatory treatment of AT&T as compared to Pacific Bell or



1 other CLCs. In the First Interconnection Order, the FCC stated that CLCs were  
2 entitled to service equal in quality. The FCC also clearly stated that CLCs must  
3 pay for costs associated with higher service levels. See Para. 225 of the First  
4 Interconnection Order.

5 We propose to use service indicators generally accepted in the  
6 telecommunications industry to compare the quality of service we are providing  
7 to AT&T and ourselves. On the basis of these comparative measures, we will  
8 be evaluated on our performance and adherence to the First Interconnection  
9 Order. Additionally, we believe it is appropriate that AT&T be required to  
10 provide comparable level of service to Pacific Bell when Pacific Bell obtains  
11 service from AT&T, so that end users are able to take advantage of the choices  
12 made available by the First Interconnection Order.

13  
14 **Q.7. What measures will be used to verify "quality" of service?**

15 A. We are proposing the same measures Pacific Bell uses internally for  
16 equivalent retail products where comparable processes exist between resale  
17 and retail ("comparative measures")(Appendix JS-3). These measures are  
18 common throughout the telecommunications industry and are used to manage  
19 our business today.

20 Where comparable retail product processes do not exist, and a new  
21 process has been designed specifically for wholesale and resale (e.g., firm  
22 order confirmation process), then performance standards will apply.  
23 Measurements associated with Total Services Resale, as cited in Mr. Richards'  
24 testimony, do not measure comparable service, but rather create a higher level  
25 of service which AT&T will use to differentiate itself from the other CLCs.  
26 AT&T's requested service levels are only permitted by para. 225 of the First  
27 Interconnection Order if AT&T pays for the higher grade of service.

1           Where a process used in retail, for technical reasons, cannot be used  
2 initially for resale, but the output of the process is still required (e.g., the interim  
3 telephone number assignment process), third party audits of that resale  
4 process will be used in lieu of performance measurements when sufficient  
5 evidence exists to support the need for an audit. However, the following  
6 conditions will apply:

7           1.     If audit findings indicate a process problem, we will be given a  
8 reasonable period of time to correct the problem.

9           2.     Liquidated damages could apply only after the period of time to  
10 correct the problem has expired.

11          3.     To ensure the confidentiality of proprietary information of Pacific  
12 Bell, its customers and other CLCs, Pacific Bell and AT&T will mutually agree to  
13 a third party auditor.

14          4.     AT&T will pay for such audits.

15  
16 **Q.8. Are penalties required or appropriate?**

17 A.           The First Interconnection Order does not require any form of monetary  
18 penalty associated with the "equal in quality" standard. However, if we do not  
19 provide service that is equal in quality, the Act itself imposes severe penalties.  
20 For example, to enter the long distance market, we must convince the FCC  
21 that we will meet all of our Section 251 obligations, including the provision of  
22 service that is at least equal in quality to the service we provide ourselves and  
23 our affiliates. Entry authority may be denied if we cannot make such a  
24 demonstration. AT&T also may seek injunctive relief or monetary damages  
25 from us before the FCC or in court under Sections 206-208 of the  
26 Communications Act, and may seek similar relief from this Commission. There  
27

1 is no need for a monetary penalty as an additional "incentive" for Pacific Bell to  
2 comply with the Act.

3 AT&T has recommended that performance be measured and applied on  
4 a order-by-order basis. Evaluating performance per order provides no measure  
5 of overall service comparability, but merely the service performance relative to  
6 the individual order. To ensure comparable service, remedies should only apply  
7 to service levels measured for activity over a period of time (monthly, for  
8 example). Should AT&T require a specific service level on a per-event basis,  
9 this is negotiable but will involve compensation to us, as required by the Act, to  
10 provide a guaranteed level of service.

## 11 12 **SECTION II. COMPARATIVE MEASURES AND PERFORMANCE STANDARDS**

13  
14 **Q.9. Should Pacific Bell be required to adopt AT&T's supplier performance**  
15 **quality management system?**

16 **A.** No. We already have a quality management system that measures retail  
17 product and process service quality performance. These measures of quality  
18 are based on generally accepted industry standards and are commonly used by  
19 incumbent LECs to evaluate quality service delivery. In addition, our  
20 performance criteria used to evaluate service quality are widely accepted by the  
21 regulatory bodies and the results are shared with the Commission on a  
22 quarterly basis to ensure that our retail customers are receiving quality service.  
23 For example, we provide the Commission quarterly results regarding installation  
24 appointments met and customer trouble reports.

25 We believe that use of these comparative measures will ensure that the  
26 service quality AT&T experiences is on par with that which is provided to  
27 ourselves and our retail customers for the same products. Further, while the

1 First Interconnection Order does not require us to provide comparative data to  
2 AT&T, we are willing to provide the appropriate data to AT&T.

3 If AT&T requests us to adopt their "Total Service Resale" (TSR) plan  
4 including their Supplier Performance Quality Management System and their  
5 DMOQs, Para. 225 of the First Interconnection Order require AT&T to pay all  
6 costs associated with Pacific Bell's design, development and delivery of this  
7 unique product.

8  
9 Q.10. Does Pacific Bell know what it would cost to provide AT&T's requested  
10 level of service?

11 A. No. AT&T presented their Supplier Quality Management System and  
12 DMOQs to Pacific Bell in early August. Pacific Bell has not had sufficient time  
13 to study the cost to design, develop, implement, and report the DMOQs or the  
14 cost involved to implement system changes or increase staffing to meet AT&T's  
15 DMOQs. However, Appendix JS-2 identifies the cost associated with just two  
16 of AT&T's DMOQs. For example, it would cost nearly \$500,000 just to meet  
17 AT&T's speed of answer requirement. This expense is totally unnecessary, as  
18 Pacific Bell has an electronic system that AT&T could use rather than calling  
19 Pacific Bell to place its interconnection order. The second example in Appendix  
20 JS-2 relates to AT&T's DMOQ for immediate status on trouble reports. It would  
21 cost over \$800,000 to meet this request. These are just two small examples of  
22 the additional cost necessary to meet AT&T's request for service that is better  
23 than Pacific Bell provides to itself.

24

25

26

27

1 Q.11. Are all of the service quality data provided to the Commission germane to  
2 the local competitive environment?

3 A. No. Because of operational differences in the way in which retail and  
4 resale customers are served, some service quality data provided to the  
5 Commission about our retail service performance levels are irrelevant in the  
6 CLC environment. In other cases, service quality indicators appropriate in the  
7 CLC environment are not applicable to our retail channel. For example, we  
8 currently measure and report to the Commission speed of answer in our  
9 business offices. This service quality indicator measures the accessibility of a  
10 service representative in our retail business office. In the wholesale  
11 environment, where the ordering interface between our companies is electronic,  
12 measuring speed of answering is not applicable. Conversely, because the  
13 interface between our companies is electronic, it is appropriate for us to confirm  
14 orders received from AT&T within a specified time. This measure, commonly  
15 referred to as Firm Order Confirmation (FOC) in the wholesale ordering  
16 environment, is irrelevant in our retail channels. FOC is an example of a  
17 performance standard developed for the new interconnection environment.  
18 Prior to the release of the First Interconnection Order, we met with a number of  
19 CLCs, including AT&T, to discuss our comparable measures and performance  
20 standards and gained agreement through negotiation with AT&T to such  
21 comparable measures of service and performance standards.

22  
23 Q.12. Does Pacific Bell's quality management system ensure AT&T of non  
24 discriminatory service as it relates to pre-ordering, ordering, provisioning,  
25 maintenance, repair, wholesale billing, usage data transfer and operator  
26 services?

27 A. Yes, although the appropriate measurement differs, as set forth below:

1                   1.     AT&T's Operator Services traffic is co-mingled with our  
2     operator services traffic, so absolute parity is assured with our retail channel.  
3     An additional measurement is not required.

4                   2.     In those areas where we have a comparable retail or  
5     wholesale measure of service (ordering, provisioning, maintenance and repair)  
6     we will measure the performance provided to AT&T against our retail  
7     performance to ensure that they are equivalent, considering class of service,  
8     geographic area, and time period.

9                   3.     In areas where no retail equivalent measure exists, such  
10    as pre-ordering, performance standards have been developed and agreed to  
11    by AT&T.

12                  4.     Our responsibility for wholesale billing is already defined in  
13    the CPUC tariff schedule 175T, section 18.1. AT&T's proposed wholesale  
14    billing DMOQs are not appropriate or required.

15                  5.     Where the process used in retail is not initially adaptable  
16    to resale for technical reasons, but the output of the process is still required  
17    (e.g., the interim telephone number assignment process), third-party audits of  
18    the process may be used in lieu of performance standards.

19  
20 **Q.13. What service quality measures does Pacific Bell propose to evaluate to**  
21 **assure "equal in quality" service to AT&T?**

22 **A.**           We have compiled a comprehensive list of service quality indicators for  
23    pre-ordering, provisioning and maintenance. ( Appendix JS-1). We believe  
24    these service indicators assure AT&T service that is equal in quality to that  
25    which we provide to ourselves and our retail customers. We have reached  
26    agreement in concept with AT&T on these comparative measures of parity.

27

1 Q.14. Do the same comparative measures apply to operator services?

2 A. Comparative measures do not apply in the Operator Services  
3 environment because CLC traffic is not distinguishable from Pacific Bell traffic.  
4 This applies to both Operator Assistance (0, 0+) and Directory Assistance (411)  
5 calls. Since all customers receive the same level of service, there is nothing to  
6 measure or compare. Although it is not a comparative measure, we are willing  
7 to provide to AT&T service availability information for operator services.  
8 Pacific Bell proposes the status reports contained in Appendix JS-4.

9  
10 Q.15. What does Pacific Bell recommend in the area of usage data transfer?

11 A. We agree that this is an important area and should be measured.  
12 However, unlike AT&T, we support the principle of parity of usage data transfer,  
13 not 100% accuracy even when it is not customer-affecting. A proper measure  
14 would compare the time interval experienced in the delivery of data to the  
15 CLC's billing system to the interval experienced in the delivery of data to  
16 ourselves. Remedies should only apply in cases where our failure to delivery  
17 data results in an inability for AT&T to bill its end users and a loss of revenue is  
18 incurred.

19 Currently, there are no substantive data to support a reliable measure of  
20 parity. For example: 1) we have no historical data on delivery of the volumes  
21 of resale usage contemplated by the First Interconnection Order; 2) we can't  
22 be certain that the specific geography targeted by a given CLC will not affect  
23 the actual results (e.g. some end offices don't support data transfer as quickly  
24 as others, which could seriously skew results for those CLCs marketing in  
25 areas where there are less sophisticated switches); 3) our data transfer  
26 process is still evolving and work is underway to accelerate the delivery  
27 timeframes; and 4) the efficacy of our returns process has not been tested as

1 we do not know the timing or capabilities of the various CLCs to turnaround any  
2 questioned usage that they may receive.

3 For the reasons stated above, any measurement based on our current  
4 process and volumes would be arbitrary and unreliable. We recommend  
5 continuing the discussions and testing that has recently begun with AT&T on  
6 this issue. Only after adequate volume testing and further refinement of our  
7 process would a measure of data transfer parity be appropriate.

8 With regard to quality, we do have historical data that show an extremely  
9 high degree of reliability and accuracy, i.e. >99.999% of recorded messages  
10 are able to be billed accurately. And, in the rare cases where recorded  
11 messages are damaged or corrupted, there is not sufficient information in the  
12 record to distinguish between CLC calls and our calls. Our recommendation in  
13 the area of quality is to follow Pacific Bell's proposed contract, which provides  
14 that either party may request an audit of usage reports and/or data under the  
15 appropriate terms and conditions.

16  
17 **Q.16. Are Pacific Bell's proposed service measurements sufficient for the**  
18 **future?**

19 **A.** We believe that the measures of quality we propose apply the most  
20 appropriate retail quality measures to the wholesale and resale channels today.  
21 Where gaps exist because of differences in the channels, performance  
22 standards have been developed and, in many cases, agreed to by AT&T. We  
23 believe additional measures of quality may be developed as the business  
24 relationship between the incumbent LEC and the CLC matures. This has been  
25 our experience in other markets where some measures of quality were  
26 abandoned and replaced by more meaningful performance indicators. We  
27 would also expect a reciprocal service quality measurement system to be



1 established by the AT&T for customers returning to Pacific Bell that is  
2 comparable to the level of service AT&T provides to itself and its customers.  
3 We believe it is inappropriate for the Commission to adopt the quality  
4 management system of AT&T as the industry standard by which service to  
5 every CLC and ourselves is measured. Adopting AT&T's Supplier Performance  
6 Quality Management System would unnecessarily drive up the cost of service  
7 we provide to our customers and other CLCs.

8  
9 Q.17. Will Pacific Bell provide service quality performance data when a CLC  
10 requests a level of service different than the "equal in quality" criteria  
11 when it is technically feasible?

12 A. Yes. We intend to fully comply with the First Interconnection Order,  
13 which states:

14  
15 We conclude that service made available for resale be at  
16 least equal in quality to that provided by the incumbent LEC  
17 to itself or to any subsidiary, affiliate, or any other party to  
18 which the carrier directly provides the service, such as end  
19 users. Practices to the contrary violate the 1996 Act's  
20 prohibition of discriminatory restrictions, limitations or  
21 prohibitions on resale.

22 Consistent with the First Interconnection Order, we expect the requesting CLC  
23 to bear the costs associated with service development, delivery and  
24 performance measurement where this level of performance or measurement is  
25 technically feasible. For example, AT&T has advised us that it does not intend  
26 to use our electronic interface called Pacific Bell Service Manager (PBSM) for  
27 reporting troubles. Instead, AT&T would prefer to call the Interconnection  
Service Center (ISC) to report trouble and request that we provide it with  
interim status reports on troubles. To this end, AT&T has provided us with its